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August 10, 2000
CUFFS
P.O. Box 22928
Seattle, WA 98122

Comments

Docket No. 00N-1351

Food Labeling: The Use of the Term "Fresh" for Foods Processed With
Alternative Nonthermal Technologies - Public Meeting

Dear Food and Drug Administration,

Consumers United for Food Safety (CUFFS) is a consumer education-and-action group concerned with food safety, food quality, consumer labeling and the appropriateness of new food technologies.

According to the Webster's dictionary, the word "fresh" commonly means - 1. recently grown or newly made - such as in "fresh" coffee. 2. having original strength, vigor, quality, taste.

This is what consumers understand as the meaning of the word "fresh" and in regard to food, it means "recently grown" in contrast to stored-for-a-long-time or processed in any way. "Fresh" in terms of industry's use of the word, is an effort to market or capitalize on the public's desire for foods of high quality, good taste and recent harvest.

It is a disservice to consumers to redefine the word "fresh" as commonly understood for industry's advertising purposes and to try to "stretch" the word to include irradiation or any other processing technology such as high pressure, pulsed light, etc. which are used for specific industrial purposes such as meeting quarantine regulations, reducing bacterial contamination or extending shelf life. By trying to stretch the meaning on behalf of industry's request, you rob the word of any meaning at all. The term "fresh" is not used just in contrast to one processing terminology such as heat. It stands in contrast to all processing. The future will probably bring more technological treatments of food. You have opened a Pandora's Box of misdefinitions. We feel it was a mistake to include irradiation up to 1 kilogray as a "fresh" food product. There are small losses of vitamins and texture even below that irradiation dose. Some crops are very radiation sensitive.

Consumers would like to know how their food has been grown (organic or non-organic) and if it has been further processed after harvest. The consumer has always favored more rather than less information in choosing food (farming method, country of origin, processing, etc.)

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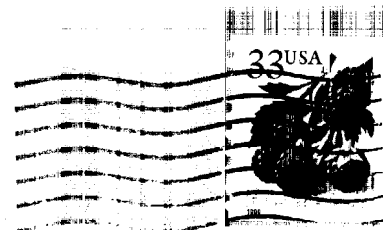
Consumers will lose faith in government agencies if labeling information is misleading, distorted or incomplete. So will our trade partners. Generally if a food has been tampered with but still looks the same, it should be truthfully labeled as to any additional treatments. We urge you to rescind your inclusion of irradiated products as "fresh" and not add other non-thermal processing methods.

Sincerely,

A handwritten signature in cursive script that reads "Connie Wheeler".

Connie Wheeler, Managing Director
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